

WHITE & CASE LLP
1221 Avenue of the Americas
New York, New York 10020-1095
(212) 819-8200
John K. Cunningham
Gregory M. Starner
Andrea Amulic
Ricardo M. Pasianotto
Lilian M. Marques
Livy Mezei (admitted *pro hac vice*)

Southeast Financial Center
200 South Biscayne Blvd., Suite 4900
Miami, Florida 33131
(305) 371-2700
Richard S. Kebrdle (admitted *pro hac vice*)

*Attorneys for Antonio Reinaldo Rabelo Filho,
as Petitioner and Foreign Representative*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Americanas S.A., *et al.*,¹

Debtors in a Foreign Proceeding.

)
)
) Case No. 23-10092 (MEW)
)
)
) Chapter 15
) (Jointly Administered)
)

**NOTICE OF HEARING ON MOTION FOR ORDER PURSUANT TO
11 U.S.C. §§ 105, 1507, 1521, AND 1525 (I) ENFORCING THE
BRAZILIAN RJ PLAN AND (II) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that on June 20, 2024, Antonio Reinaldo Rabelo Filho (the
“**Petitioner**” or “**Foreign Representative**”)², in his capacity as the duly-authorized foreign

¹ The debtors in these chapter 15 cases, along with the last four digits of each debtor’s tax identification number in its applicable jurisdiction of incorporation, are as follows: Americanas S.A. (06-60 – Brazil); JSM Global S.à.r.l. (5670 – Grand Duchy of Luxemburg); and B2W Digital Lux S.à.r.l. (8659 – Grand Duchy of Luxemburg).

² Unless otherwise indicated herein, capitalized terms shall have the meaning ascribed to them in the Motion (as defined herein) or the Brazilian RJ Plan (as defined herein), as applicable, and unless otherwise specified, all citations to ECF docket numbers herein are in reference to case number 23-10092 (MEW).

representative (as such term is defined in section 101(24) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “**Bankruptcy Code**”)) of the above-captioned debtors (collectively, the “**Chapter 15 Debtors**”) with respect to the jointly-administered judicial reorganization (*recuperação judicial* or “**RJ**”) proceeding (the “**Brazilian RJ Proceeding**”) of the Chapter 15 Debtors being administered by the 4th Business Court of the City and State of Rio de Janeiro, Brazil (the “**Brazilian RJ Court**”) pursuant to Federal Law No. 11.101 of February 9, 2005 of the laws of the Federative Republic of Brazil (the “**Brazilian Bankruptcy Law**”) filed a *Motion for Order Pursuant to 11 U.S.C. §§ 105, 1507, 1521, and 1525 (I) Enforcing the Brazilian RJ Plan and (II) Granting Related Relief* [ECF No. 65] (the “**Motion**”) in the above-captioned cases under chapter 15 of the Bankruptcy Code with the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”).

PLEASE TAKE FURTHER NOTICE that pursuant to the Motion, the Foreign Representative seeks the entry of an order (the “**Proposed Order**”) that, among other things: (i) gives full force and effect and grants comity in the United States to the joint plan of reorganization submitted by the RJ Debtors to the Brazilian RJ Court and approved by the majority of creditors on December 19, 2023 (the “**Brazilian RJ Plan**”) and the order of the Brazilian RJ Court dated February 26, 2024 confirming the Brazilian RJ Plan (the “**Brazilian Confirmation Order**”), (ii) to the extent provided for in the Proposed Order, issues a permanent injunction enjoining actions that would interfere with the implementation of the Brazilian RJ Plan and the Brazilian Confirmation Order, and (iii) grants related relief as may be just and proper.

PLEASE TAKE FURTHER NOTICE that copies of the Motion and all accompanying documentation, including the Brazilian RJ Plan and Brazilian Confirmation Order, are available to parties in interest on the Bankruptcy Court’s Electronic Case Filing System, which can be

accessed from the Bankruptcy Court's website at <http://www.nysb.uscourts.gov> (a PACER login and password are required to retrieve a document) and that copies of the Brazilian RJ Plan, Brazilian Confirmation Order, and other key filings in connection with the Brazilian RJ Proceeding can be accessed free of charge, in electronic format through Americanas S.A.'s website at under the heading "Judicial Reorganization."

PLEASE TAKE FURTHER NOTICE that the Bankruptcy Court has scheduled a hearing (the "**Hearing**") to consider the relief requested in the Motion for **July 11, 2024 at 10:00 a.m. (ET)** before the Honorable Michael E. Wiles of the United States Bankruptcy Court for the Southern District of New York.

PLEASE TAKE FURTHER NOTICE that the Hearing will be held virtually via Court Solutions, and any party in interest objecting to the Motion or the relief requested therein must appear at the Hearing at the time set forth above (unless ordered otherwise by the Bankruptcy Court). The Hearing will be conducted telephonically using Court Solutions, in accordance with General Order M-543 dated March 20, 2020 (Morris, C.J.) ("**General Order M-543**").

PLEASE TAKE FURTHER NOTICE that any party in interest wishing to appear at or attend the Hearing, whether making a "live" or "listen only" appearance before the Court, must refer to the Bankruptcy Judge's guidelines for telephonic appearances and make arrangements with **Court Solutions LLC** (<https://www.court-solutions.com/>) on or before 12:00 p.m. (prevailing Eastern Time) the business day before the Hearing (the "**Appearance Deadline**") and not by emailing or otherwise contacting the Bankruptcy Court. Instructions to register for Court Solutions LLC are attached to the Court's General Order M-543.

PLEASE TAKE FURTHER NOTICE that any party in interest wishing to submit a response or objection to the Motion must do so in accordance with the Bankruptcy Code, the

Federal Rules of Bankruptcy Procedure, and the local rules of the Bankruptcy Court, and such response or objection must be in writing and set forth the basis therefor. Any such response or objection must be filed electronically with the Bankruptcy Court in accordance with General Order M-399 and the Court's Procedures for the Filing, Signing and Verification of Documents by Electronic Means (copies of each of which may be viewed on the Court's website at www.nysb.uscourts.gov) and shall be served upon counsel to the Foreign Representative, White & Case LLP, 1221 Avenue of the Americas, 44th floor, New York, NY 10020-1095 (Ricardo M. Pasianotto (ricardo.pasianotto@whitecase.com), **so as to be received by 4:00 p.m. (Prevailing Eastern Time) on or before July 3, 2024**, with a courtesy copy served upon the Chambers of the Honorable Judge Michael E. Wiles (wiles.chambers@nysb.uscourts.gov).

PLEASE TAKE FURTHER NOTICE that if no response or objection is timely filed and served as provided above, the Bankruptcy Court may grant the relief requested in the Motion without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that the Hearing may be adjourned from time to time without further notice other than an announcement in open court, or a notice of adjournment filed with the Bankruptcy Court, of the adjourned date or dates at the hearing or any other further adjourned hearing.

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New York, New York

Dated: June 20, 2024

/s/ Richard S. Kebrdle

Richard S. Kebrdle

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